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BEFORE THE
FEDERAL AVIATION ADMINISTRATION
WASHINGTON, DC

DEPT. OF TRANSPORTATION
DOCKETS

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In the Matter of)
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SECURITY CONSIDERATIONS FOR THE)
FLIGHTDECK ON FOREIGN OPERATED)
TRANSPORT CATEGORY AIRPLANES)
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Final Rule)
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Docket No. FAA-2002-12504 – 20

COMMENTS OF

THE ASSOCIATION OF ASIA PACIFIC AIRLINES

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Dated: 15 August 2002

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COMMENTS OF
THE ASSOCIATION OF ASIA PACIFIC AIRLINES

This submission by the Association of Asia Pacific Airlines (AAPA) is made on behalf of its member airlines¹ in response to the Final Rule issued by the Federal Aviation Administration (FAA) on June 21, 2002, regarding Security Considerations for the Flightdeck on Foreign Operated Transport Category Airplanes (Docket No. FAA-2002-12504). The Final Rule requires improved flightdeck security and operational and procedural changes to prevent unauthorized access to the flightdeck on passenger-carrying aircraft and some cargo aircraft operated by foreign carriers under the provisions of 14 CFR Part 129.

I. BACKGROUND

The AAPA appreciates the opportunity to comment on the Final Rule regarding improved flightdeck security. The AAPA also provided comments on this matter at the public meeting scheduled and conducted by the FAA on July 30, 2002, and submitted those comments to the docket. At the public meeting, the FAA panel asked the AAPA several questions that are addressed in this filing.

¹ AAPA members include Air New Zealand, All Nippon Airways, Asiana Airlines, Cathay Pacific Airways, China Airlines, EVA Airways, Dragonair, Garuda Indonesia, Japan Airlines, Korean Air, Malaysia Airlines, Philippine Airlines, Qantas Airways, Royal Brunei Airlines, Singapore Airlines, Thai Airways International, and Vietnam Airlines.

The AAPA wants to make it clear, especially in light of the events of September 11, 2001, that it supports and understands the need to protect persons and property from terrorism. The AAPA is committed to working with the United States and its various responsible government agencies, including the FAA, in this regard.

The AAPA member airlines operating to the U.S. are working very hard to meet the April 9, 2003, compliance date as required by the Final Rule, and intend to do so if possible. To achieve this, the airlines are stretching their internal resources to the limit and are doing so with very little buffer period to accommodate delivery schedule slippages by flightdeck door suppliers.

AAPA airlines require time to acquire the modification kits and to schedule the modifications with as minimal a disruption as possible to their revenue flights, especially in the current difficult financial environment. It is both reasonable and prudent to not only implement this rule to enhance security, but to do so in a manner that does not unduly disrupt day-to-day activities and commerce. The AAPA believes that this is a challenge that can be met, but only by working together. To this end, AAPA offers the following comments.

II. AAPA CARRIERS FACE A SIGNIFICANT COMPLIANCE TASK

To provide some perspective, the 17 AAPA member carriers operate almost 25 percent of the global Airbus A330 and A340 fleet, and almost one-third of the Boeing B747 and B777 fleet. Thirteen of the 17 AAPA members currently operate to the U.S. and are directly affected by this Final Rule.

At the public meeting on July 30, 2002, the FAA panel asked for the number of aircraft operated by the affected AAPA carriers rather than the percentage of aircraft operated. As of November 2001, the 13 AAPA members flying to the U.S. operate 105 Airbus A330 and A340 aircraft, 400 Boeing B747 aircraft, and 118 Boeing B777 aircraft.

At the public meeting, the FAA panel also asked the AAPA to provide the specific breakouts on the types of aircraft operated by affected AAPA members. The aircraft currently in operation, including those added in 2002 and combination aircraft and freighters totals 4 Airbus A300-600 aircraft, 41 Airbus A330 aircraft, 31 Airbus A340 aircraft, 11 Boeing B737-800 aircraft, 44 Boeing B767 aircraft, 303 Boeing B747-400 aircraft, 71 Boeing B747-200/300 aircraft, 115 Boeing B777 aircraft, and 12 Boeing MD-11 aircraft. These figures are somewhat different than those in the preceding paragraph because a significant number of A330 aircraft and some B747 aircraft do not operate to the U.S.

III. CERTIFICATION AND DELIVERY SCHEDULES ARE SLIPPING

It appears that the certification dates are slipping for both Airbus and Boeing door redesign for various respective models. This will likely result in delayed kit deliveries to the airlines.

Several flightdeck modification kits are not expected to receive certification until later this year and will make it difficult for carriers to meet the compliance deadline. Kits for the classic Boeing B747, for example, will not be certified before January 2003, and kits for the B747-400, B777 and DC-10/MD-11 will not be certified until mid to late September 2002. While Airbus received Joint Aviation Authorities (JAA) approval for the A330/A340 kit, it has not yet received FAA certification. The most recent information on the Airbus A330/A340 indicates that the bulkhead/door kits for the A330 and A340 will not be ready for shipment until November 2002. Also, JAA and FAA certification for the Airbus A300/A310 is not anticipated until the end of 2002.

The AAPA understands that C&D Aerospace is the only flightdeck door kit manufacturer granted approval by the FAA to date. While this is a positive development, it does not fully address airline demand. C&D Aerospace was contracted to produce kits for most Boeing narrow body and Douglas-designed jets and obtained a supplemental type certificate (STC) for its B737-800 kit on July 3, 2002.

IV. LATE SUPPLIER DELIVERY WILL SIGNIFICANTLY INCREASE CARRIER COMPLIANCE COST

AAPA estimates that the total installation cost for the affected AAPA fleet is USD\$25 million. This figure includes both the cost for door kits and labor.

Of great concern is that the installation cost will increase significantly with certification and resulting kit delivery delays. A recent survey by the Air Transport Association of America (ATA) indicates that certification delays would add an average of 20 percent to the projected upgrade costs.

Applying the ATA information, kit delivery delays would escalate the total installation cost for AAPA members to USD\$30 million. This additional cost results mostly from added aircraft downtime and less flexibility to combine door work with other scheduled maintenance service to meet the April 9 deadline.

At the public hearing, the FAA requested the financial assumptions used to arrive at the USD\$30 million figure. This calculation is based on information provided by vendors showing (1) the cost for door kits ranging from USD\$28,000 to USD\$39,000 and (2) the cost for installation per door ranging from USD\$3,000 to

USD\$4,000 based on a standard labor rate of USD\$50 per hour and the installation time at 60 hours to 80 hours per door.

In addition to the installation cost, the cost to ground any aircraft that cannot meet the April 9, 2003, deadline because of delays in kit delivery are also significant. An AAPA member carrier estimated, for example, that the downtime cost for not operating a B747-400 was USD\$350,000 per day. At the public hearing, the FAA asked for the assumptions used to calculate this daily downtime cost. AAPA was informed by the member airline that provided this figure that the assumptions were based on proprietary information that could not be revealed.

V. CARGO AIRCRAFT OPERATIONS SUGGEST ALTERNATIVE TO REINFORCED DOORS WOULD ALSO BE EFFECTIVE

The Final Rule stipulates that all transport category cargo airplanes that have a door installed between the pilot compartment and any other occupied compartment on this rule's effective date should apply this rule.

The affected AAPA member carriers operate a number of cargo aircraft. At the public hearing, the FAA panel asked for a breakdown of the cargo aircraft operated by the 13 AAPA members flying to the U.S. That total, as of July 31, 2002, is 30 Boeing B747-400 aircraft, 20 Boeing B747-200/300 aircraft and 9 Boeing MD-11 aircraft.

Because the nature of cargo operations is different from that of passenger operations, the actions necessary to enhance flightdeck security can also be different. Specifically, with so few people, if any, in addition to the pilots onboard a cargo aircraft, it is possible to implement operational procedures to ensure adequate security. All those being transported on the cargo aircraft in question, for example, could undergo background checks and proper screening.

VI. CONCLUSIONS

Working to improve flightdeck security on commercial aircraft requires cooperation. The AAPA is dedicated to working with the FAA and the U.S. Government to accomplish this goal.

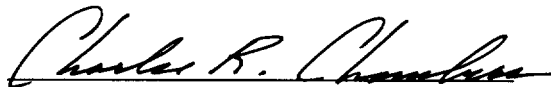
The AAPA is concerned, however, that the FAA will hold carriers accountable for delays and late deliveries of flightdeck door kits that will result in carriers missing the April 9, 2003, compliance deadline. It is not reasonable to punish carriers for something that is not under their control.

Accordingly, the AAPA would respectfully request that the FAA provide maximum support to ensure prompt certifications and kit deliveries. Further, the AAPA

would request that the FAA grant limited exemptions from the April 9, 2003, compliance date, as appropriate, to any airline that has taken reasonable steps to comply with the deadline, but cannot do so because of limitations beyond their control with the approval and/or hardware delivery process.

The AAPA would also caution that the need to improve flightdeck security not give way to actions that are not particularly useful, well-justified, or as efficient and effective as otherwise possible. The AAPA would, therefore, respectfully request that the FAA consider granting exemptions to this rule for transport category cargo airplanes with a flight deck door should an airline decide not to install reinforced cockpit doors but, rather, establishes an internal security procedure that would (1) be FAA-approved, (2) positively identify and screen all persons on cargo airplanes, and (3) provide the equivalent level of security as the improved door.

Respectfully submitted,

A handwritten signature in cursive script, reading "Charles R. Chambers".

Charles R. Chambers
Global Aviation Associates, Ltd.
for
Leroy Keith
Technical Director
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